



**IT IS HEREBY ADJUDGED and DECREED that the below described is SO ORDERED.**

**Dated: July 27, 2022.**

  
\_\_\_\_\_  
**MICHAEL M. PARKER**  
**UNITED STATES BANKRUPTCY JUDGE**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT, LLC, ET AL. <sup>1</sup> ,	§	BANKRUPTCY NO. 21-51523
	§	
DEBTORS.	§	JOINTLY ADMINISTERED

**ORDER GRANTING TRUSTEE'S APPLICATION TO EMPLOY  
COUNSEL FOR SPECIAL PURPOSE**

Came on for consideration the *Trustee's Application to Employ Counsel for Special Purpose* (the "**Application**").<sup>2</sup> Based on the representations made in the Application and in the supporting *Affidavit of Jason EMcKinnie of McKinnie & Paul, PLLC.* (the "**McKinnie**

<sup>1</sup> The administratively consolidated chapter 7 cases, along with their respective case numbers and the last four digits of each Debtor's federal tax identification number, are: In Re: Policy Services, Inc. 21-51513 (2864), In Re: Wizard Mode Media, LLC, 21-51514 (3205), In Re: deeproot Pinball LLC, 21-51515 (0320), In Re: deeproot Growth Runs Deep Fund, LLC, 21-51516 (8046), In Re: deeproot 575 Fund, LLC, 21-51517 (9404), In Re: deeproot 3 Year Bonus Income Debenture Fund, LLC, 21-51518 (7731), In Re: deeproot Bonus Growth 5 Year Debenture Fund, LLC, 21-51519 (9661), In Re: deeproot Tech LLC, 21-51520 (9043), In Re: deeproot Funds LLC, 21-51521 (9404), In Re: deeproot Studios LLC, 21-51522 (6283), and In Re: deeproot Capital Management, LLC, 21-51523 (2638), each a "**Bankruptcy Estate**" and collectively, "**Bankruptcy Estates**". Each debtor entity is "**Debtor**" and collectively, "**Debtors**".

<sup>2</sup> Capitalized terms unless otherwise defined herein shall have the meaning as ascribed to them in the Application.

**Affidavit**”), the Court finds that (i) it has jurisdiction over the matters raised in the Application pursuant to 28 U.S.C. §§ 157 and 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) the relief requested in the Application approving the employment of McKinnie & Paul, PLLC (the “**Firm**”) is in the best interest of the Debtors, their respective Bankruptcy Estates and the creditors; (iv) the Firm holds no interest adverse to the Bankruptcy Estates and is a disinterested person under 11 U.S.C. § 101(4); (v) proper and adequate notice of the Application has been given and no further notice is necessary; (vi) no objections to the Application have been filed; (vii) the Firm is qualified to be employed as special counsel to Trustee—to perform work as described in the Application for the Trustee relating to the eleven jointly administered Bankruptcy Estates—pursuant to sections 327 and 504 of the Bankruptcy Code and Bankruptcy Rules 2014 and 2016; and (viii) based upon the record herein, after due deliberation, good and sufficient cause exists for the granting of the Application in all respects.

**IT IS, THEREFORE, ORDERED** that pursuant to section 327(a) of the Bankruptcy Code, the Trustee is authorized to employ the Firm as his special counsel effective as of June 26, 2022, in accordance with the terms described in the Application and this Order, and to perform the services described therein.

**IT IS FURTHER ORDERED** that if any supplemental declarations or affidavits are filed and served after entry of this Order, absent any objections within 21 days after the filing and service of such supplemental declarations or affidavits, the Firm’s employment shall continue as authorized pursuant to this Order.

**IT IS FURTHER ORDERED** that the Firm shall be compensated for its proposed legal services described in the Application from Turner Logic, LLC. None of the Bankruptcy Estates shall be responsible for payment of special counsel’s fees for the proposed legal services described

in the Application. The Trustee has agreed to these terms in order to preserve value in assets of  
the respective Bankruptcy Estates.

**IT IS FURTHER ORDERED** that the Court shall retain jurisdiction to hear and determine  
all matters arising from the implementation of this Order.

###

**Submitted by:**

Randall A. Pulman

Texas State Bar No. 16393250

**PULMAN, CAPPUCCIO & PULLEN, LLP**

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**ATTORNEYS FOR JOHN PATRICK LOWE,  
CHAPTER 7 TRUSTEE FOR THE JOINTLY  
ADMINISTERED BANKRUPTCY ESTATE OF  
DEEPROOT CAPITAL MANAGEMENT, LLC, ET AL.**

In re:  
deeproot Capital Management, LLC  
deeproot Capital Management, LLC  
Debtors

Case No. 21-51523-mmp  
Chapter 7

## CERTIFICATE OF NOTICE

District/off: 0542-5  
Date Rcvd: Jul 27, 2022

User: admin  
Form ID: pdfintp

Page 1 of 4  
Total Noticed: 2

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
#	Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 29, 2022:**

Recip ID	Recipient Name and Address
db	#+ deeproot Capital Management, LLC, 12621 Silicon Dr, San Antonio, TX 78249-3447
intp	+ Jason McKinnie, McKinnie & Paul, PLLC, 8610 N. New Braunfels Ave., Suite 320, San Antonio, TX 78217-6358

TOTAL: 2

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

**The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.**

Recip ID	Bypass Reason	Name and Address
jaddb	*+	deeproot Capital Management, LLC, 12621 Silicon Dr, San Antonio, TX 78249-3447

TOTAL: 0 Undeliverable, 1 Duplicate, 0 Out of date forwarding address

## NOTICE CERTIFICATION

**I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Jul 29, 2022

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

**The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 27, 2022 at the address(es) listed below:**

Name	Email Address
A. Craig Hale	on behalf of Creditor Draper 5 LLC achale@halewoodlaw.com
Catherine A. Curtis	on behalf of Debtor deeproot 575 Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot Studios LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com

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Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot 575 Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot Growth Runs Deep Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot Tech LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot Pinball LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot Capital Management LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot Growth Runs Deep Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot Tech LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot BonusGrowth 5 Year Debenture Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor Policy Services Inc. catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor Wizard Mode Media LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot Capital Management LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot Studios LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of Debtor deeproot BonusGrowth 5 Year Debenture Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot 3 Year Bonus Income Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor Wizard Mode Media LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Catherine A. Curtis	on behalf of JointAdmin Debtor deeproot Funds LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
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Catherine A. Curtis	on behalf of Debtor deeproot 3 Year Bonus Income Fund LLC catherine.curtis@wickphillips.com, brenda.ramirez@wickphillips.com
Christopher S. Murphy	on behalf of Creditor Texas Workforce Commission bk-cmurphy@oag.texas.gov sherri.simpson@oag.texas.gov
Don Stecker	on behalf of Creditor Bexar County don.stecker@lgbs.com
Jason M. Rudd	on behalf of Debtor deeproot Growth Runs Deep Fund LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com
Jason M. Rudd	on behalf of Debtor deeproot Studios LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com
Jason M. Rudd	on behalf of JointAdmin Debtor deeproot Capital Management LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com
Jason M. Rudd	on behalf of Debtor deeproot Funds LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com

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Jason M. Rudd	on behalf of JointAdmin Debtor deeproot 575 Fund LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com
Jason M. Rudd	on behalf of JointAdmin Debtor deeproot Studios LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com
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Jason M. Rudd	on behalf of JointAdmin Debtor Wizard Mode Media LLC jason.rudd@wickphillips.com, brenda.ramirez@wickphillips.com
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Lynne M Jurek	on behalf of Creditor Karen Ready lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Clara Dean lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Jack S. and Shirley Daniel lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Jacquelin A. Peters-Farrar lmjurek@jureklaw.com
Lynne M Jurek	

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	on behalf of Creditor Judy Marsolan lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Philip J. Erdmann lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Donald W. Cook lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Roberta L. Erdmann lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Clyde R. and Shirley Watson lmjurek@jureklaw.com
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Lynne M Jurek	on behalf of Creditor Pauline Rubin lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor JoAnn Wells Trustee Wells Trust lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Mary G. Marquis lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor David and Paula Burke lmjurek@jureklaw.com
Lynne M Jurek	on behalf of Creditor Judith L Werner Tee Judith L. Werner RLT lmjurek@jureklaw.com
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Randall A. Pulman	on behalf of Trustee John Patrick Lowe rpulman@pulmanlaw.com jgonzales@pulmanlaw.com;mvilla@pulmanlaw.com
Raymond W. Battaglia	on behalf of Creditor Conrad Car Wash Inc. rbattagliaw@outlook.com
Raymond W. Battaglia	on behalf of Creditor Susan Conrad Trust rbattagliaw@outlook.com
Raymond W. Battaglia	on behalf of Creditor Cliff Conrad rbattagliaw@outlook.com
Raymond W. Battaglia	on behalf of Creditor CCW Braun Heights LLC rbattagliaw@outlook.com
United States Trustee - SA12	USTPRegion07.SN.ECF@usdoj.gov

TOTAL: 74